

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

DRC LV VENTURES, LLC, SCOTT SCHROEDER,  
MARINE PARK INVESTMENTS, LLC, AND  
GREENWAY FINANCIAL GROUP, LLC,

Plaintiffs,

-V.-

IDIN DALPOUR AND MAXBEN HOLDINGS, LLC,

Defendants.

23 Civ. 7827 (JGLC)(SN)

**STIPULATION AND ~~[PROPOSED]~~ ORDER  
OF FINAL JUDGMENT**

WHEREAS, on September 1, 2023, Plaintiffs commenced this lawsuit;

WHEREAS, on October 26, 2023, Plaintiffs filed an Amended Complaint for, *inter alia*, breaches of various contractual agreements with Defendants;

WHEREAS, on December 20, 2023, the parties agreed to resolve all claims raised herein by executing a Settlement Agreement (“Settlement Agreement”) that required Defendants to make four payments to Plaintiffs. Pursuant to the Settlement Agreement, the parties executed a Stipulated Judgment in the amount of \$6,764,400.00 which Plaintiffs were authorized to file if Defendants did not make the payments to Plaintiffs required by the Settlement Agreement, except Plaintiffs agreed “to reduce the amount of the judgment by any amount(s) paid by Defendants between the Settlement Date and the date the judgment is filed,” and the parties further agreed “to

execute a new stipulated judgment reducing the amount of the judgment by any amounts paid by Defendants following the receipt of any payments of the Settlement Amount by Defendants.”

WHEREAS, Defendants did not make all of the payments required by the Settlement Agreement.

WHEREAS, Plaintiffs have elected to exercise their right pursuant to the Settlement Agreement to file a stipulated judgment in an amount reduced by the payments made by Defendants since the settlement date, which the parties hereby acknowledge total \$1,755,000, thereby reducing the stipulated liability from \$6,764,400.00 to \$5,009,400

IT IS HEREBY STIPULATED AND AGREED, by the Parties hereto, through their undersigned counsel, subject to the approval of the Court:

1. Maxben Holdings, LLC (“Maxben”) breached its contractual obligations to Plaintiffs;

2. Plaintiffs have been damaged in the amount of \$5,009,400 as a result of the foregoing breaches;

3. Idin Dalpour personally guaranteed Defendants’ debt to Plaintiffs;

4. Defendants are jointly and severally liable to Plaintiffs in the amount of \$5,009,400;  
and

9. The Clerk of the Court is directed to enter judgment in favor of Plaintiffs and against Defendants on all Counts in the Amended Complaint in the amount of \$5,009,400.

Dated: December 13, 2024

<b>Boies Schiller Flexner LLP</b>  <u>S/ Peter M. Skinner</u> Peter M. Skinner 55 Hudson Yards New York, NY 10001 Tel: 212.303.3654 pskinner@bsfllp.com  <i>Counsel for Plaintiffs</i>	<b>Thompson &amp; Skrabanek, PLLC</b>  <u>S/ John J. Thompson</u> John J. Thompson 515 Madison Avenue, 31 <sup>st</sup> Floor New York, NY 10022 Tel.: 646.568.4010 jt@ts-firm.com  <i>Counsel for Defendants</i>
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IT IS SO ORDERED this 18 day of December, 2024.

The Clerk of Court is respectfully directed to close this case.

  
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Honorable Jessica G. L. Clarke